

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

JOSEPH FRIEL, individually and on behalf of a  
class of all persons and entities similarly situated,  
Plaintiff,

vs.

LINE 5, LLC; HEADSTART WARRANTY  
GROUP LLC; and JEA MANAGEMENT  
SERVICES d/b/a COVERED AUTO,  
Defendant,

Civil Action No. 3:24-cv-01866-JKM

**CONSENT MOTION TO EXTEND  
TIME TO RESPOND TO  
PLAINTIFF'S COMPLAINT BY  
THIRTY (30) DAYS**

Defendant, JEA Management Services, d/b/a Covered Auto ("JEA") respectfully requests, with the consent of Plaintiff, that this Honorable Court grant an extension of time to file its response to Plaintiff's Complaint, ECF 1 by thirty (30) days up to and including January 18, 2025, and, in support thereof, states as follows:

1. On October 29, 2024, Plaintiff filed his Complaint. *See* ECF 1.
2. JEA did not become aware that Plaintiff served it with the Complaint until after December 6, 2024, when its response was initially due. *See* ECF 17.
3. The undersigned counsel was retained on December 19, 2024.
4. The undersigned respectfully requests an extension of time, up to and including January 18, 2025 to file its response to Plaintiff's Complaint.
5. JEA has not previously sought an extension for time to respond to the Complaint.
6. Plaintiff's counsel consented to this Motion on December 19, 2024 by telephone and by e-mail correspondence.
7. This Motion is made in good faith and not for the purpose of delay.
8. This Motion is made without waiving any of JEA's defenses.

WHEREFORE, Defendant JEA Management Services d/b/a Covered Auto respectfully requests that this Honorable Court grant its consent motion for an extension of 30 days to respond to Plaintiff's Complaint, up to and including January 18, 2025.

Respectfully submitted

**NELSON MULLINS RILEY  
& SCARBOROUGH, LLP**

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*Attorneys for Defendant,  
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**CERTIFICATE OF SERVICE**

I, Elyse Cohen, counsel for JEA Management Services d/b/a Covered Auto hereby certify that a true and correct copy of the foregoing Motion to Extend the Time to Respond to Plaintiff's Complaint was served on all parties via the CM/ECF electronic filing system on December 20, 2024.

**NELSON MULLINS RILEY  
& SCARBOROUGH, LLP**

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